

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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**RIO SISA IDEA FARM, LLC**

Plaintiff,

v.

Civil Action No. 1:14-1313

**TRULIA, INC.**

and

**LOCATION, INC.**

Defendants.

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**COMPLAINT**

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Plaintiff, Rio Sisa Idea Farm, LLC (“Plaintiff”), for its complaint against Defendants, Trulia, Inc. (“Trulia”) and Location, Inc. (“Location”) (collectively “Defendants”), alleges the following:

**Nature of Action**

1. This is a civil action for patent infringement under The Patent Act, 35 U.S.C. §§ 1-376, to prevent Defendants from further infringing Plaintiff’s U.S. Patents 8,290,705 (“the ‘705 patent”) and 8,515,673 (“the ‘673 patent”) (collectively “Plaintiff’s patents”).

**Jurisdiction and Venue**

2. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. §1331 (federal question) and §1338(a) (action arising under any Act of Congress relating to patents and copyrights).

3. Upon information and belief, Defendants regularly conduct business in the Eastern District of Wisconsin. Moreover, upon information and belief, Defendants actively market and sell services and products in this District, including but not limited to services and products that infringe Plaintiff's patents. Accordingly, venue in this District as to Defendants is proper under 28 U.S.C. § 1400(b) and/or 28 U.S.C. § 1391(b) and (c). Jurisdiction as to Defendants is proper pursuant to Wis. Stat. § 801.05(3) and/or Wis. Stat. § 801.05(4).

### **Parties**

4. Plaintiff is a Wisconsin company with its principal place of business at 1400 S. Van Dyke Road, Appleton, Wisconsin 54914. Plaintiff is the assignee and current owner of the patents-in-suit.

5. Upon information and belief, Trulia is a Delaware corporation with its principal place of business at 116 New Montgomery Street, Suite 300, San Francisco, California 94105.

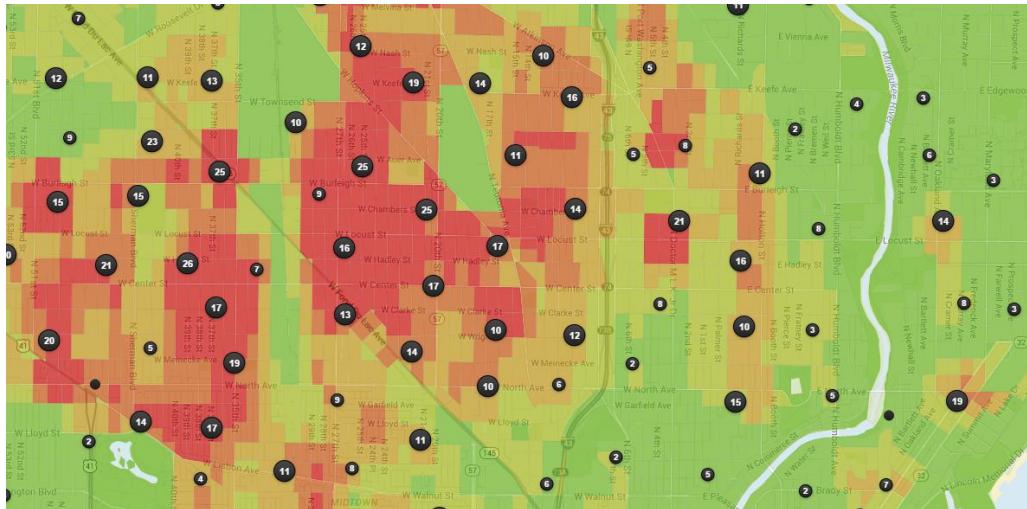
6. Upon information and belief, Location is a corporation with its principal place of business at 86 Shrewsbury Street, Worcester, MA 01604.

### **Background Facts**

7. Plaintiff's patents generally disclose a system for aggregating crime data and presenting the data to provide a crime risk assessment for a particular geographic area.

8. Trulia provides assessments that include aggregated crime data to provide a crime risk assessment for particular geographic area.

9. One example of Trulia's crime assessment is shown below, which was taken from the trulia.com website and shows the Milwaukee area:



10. Location's SECURITY GAUGE® assessments include aggregated crime data that is presented to provide a crime risk assessment for a particular geographic area.

11. One example of Location's crime assessment is shown below, which was taken from the locationinc.com website and shows the Chicago area.

Example: Chicago Crime Risk by Neighborhood



12. Upon information and belief, Location supplies aggregated crime data to Trulia.

**COUNT I:**  
**Infringement of the '705 Patent**

13. Plaintiff restates and incorporates by reference the allegations in the preceding paragraphs.
14. Defendants compile, offer to sell, and/or sell crime and security risk assessments that infringe the '705 patent in violation of 35 U.S.C. § 271(a), including assessments like those shown on the trulia.com and locationinc.com websites.
15. Upon information and belief, Defendants continue to make, use and sell their infringing products and services.
16. Upon information and belief, Defendants are willfully infringing the '705 patent.
17. Upon information and belief, Defendants will continue to infringe the '705 patent unless and until they are enjoined by a court.
18. Defendants' infringement is causing irreparable harm to Plaintiff, including, but not limited to, infringing upon Plaintiff's rights in the '705 patent.
19. Plaintiff has been damaged by Defendants' infringement of the '705 patent.
20. Defendants' conduct shows a lack of the required duty to avoid infringement of the '705 patent such that this is an exceptional case; therefore, Plaintiff should be awarded its reasonable attorneys' fees pursuant to 35 U.S.C. § 285.
21. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to enhanced damages for infringement of the '705 patent, up to treble damages.
22. Pursuant to 35 U.S.C. § 283, Plaintiff is entitled to a preliminary and permanent injunction against further infringement of the '705 patent.

**COUNT II:**  
**Infringement of the '673 Patent**

23. Plaintiff restates and incorporates by reference the allegations in the preceding paragraphs.
24. Defendants compile, offer to sell, and/or sell crime and security risk assessments that infringe the '673 patent in violation of 35 U.S.C. § 271(a), including assessments like those shown on the trulia.com and locationinc.com websites.
25. Upon information and belief, Defendants continue to make, use and sell their infringing products and services.
26. Upon information and belief, Defendants are willfully infringing the '673 patent.
27. Upon information and belief, Defendants will continue to infringe the '673 patent unless and until they are enjoined by a court.
28. Defendants' infringement is causing irreparable harm to Plaintiff, including, but not limited to, infringing upon Plaintiff's rights in the '673 patent.
29. Plaintiff has been damaged by Defendant's infringement of the '673 patent.
30. Defendants' conduct shows a lack of the required duty to avoid infringement of the '673 patent such that this is an exceptional case; therefore, Plaintiff should be awarded its reasonable attorneys' fees pursuant to 35 U.S.C. § 285.
31. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to enhanced damages for infringement of the '673 patent, up to treble damages.
32. Pursuant to 35 U.S.C. § 283, Plaintiff is entitled to a preliminary and permanent injunction against further infringement of the '673 patent.

WHEREFORE, Plaintiff Rio Sisa Idea Farm, LLC demands judgment against Trulia, Inc. and Location, Inc. as follows:

- A. That the defendants be preliminarily and permanently enjoined from manufacturing or selling any further products that infringe the '705 and '673 patents.
- B. An award of plaintiff's actual damages.
- C. An award trebling or enhancing the damages found due to defendants' willful infringement.
- D. That the defendants be ordered to turn over to plaintiff or alternatively to destroy any infringing crime risk assessments in their possession.
- E. An award of plaintiff's costs, including attorneys fees.
- F. Any other relief that the court may deem proper and just.

**JURY DEMAND**

Plaintiff Rio Sisa Idea Farm, LLC demands a jury trial for all factual issues not admitted by the defendants.

Respectfully submitted,

Dated: October 20, 2014

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